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3/16/2015
Via ECF

March 13, 2015

Hon. Denise L. Cote,
United States District Judge,
500 Pearl Street, Room 1610,
New York, NY 10007-1312.

MEMO ENDORSED

Re: FHFA v. Nomura Holding America, Inc., No. 11-cv-6201 (S.D.N.Y.)

Dear Judge Cote:

I write on behalf of the Nomura and RBS defendants regarding proposed redactions to certain materials that accompanied the place of sale reply letter filed this morning. Approximately two exhibits to defendants' letter have been designated by plaintiff as "Confidential" or "Highly Confidential" under the First Amended Protective Order, dated January 11, 2013, and defendants are therefore filing these materials under seal, pursuant to Paragraph 9 of that Order.

In order to give plaintiff the opportunity to review the documents, defendants respectfully request that the parties be given (a) until March 27, 2015 to meet and confer regarding proposed redactions, and (b) until April 3, 2015 to file a joint submission listing the agreed-upon redactions, as well as any redactions to which a party objects. Plaintiff consents to this proposed schedule.

Respectfully submitted,

/s/ David B. Tulchin

David B. Tulchin

Grant Ed.
Denise Cote
3/16/15